

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

ASHRAF AL SAFOO

No. 18 CR 696

Judge Robert Blakey

**GOVERNMENT'S AMENDED MOTION FOR ENTRY
OF PROTECTIVE ORDER GOVERNING DISCOVERY**

Pursuant to Fed. R. Crim. P. 16(d), the United States of America, by JOHN R. LAUSCH, Jr., United States Attorney for the Northern District of Illinois, files it's amended, and opposed, motion for the entry of a protective order regarding general and sensitive discovery material, and in support thereof states as follows:

1. The indictment in this case charges defendant with conspiracy to provide material support to a foreign terrorist organization, in violation of Title 18, United States Code, Section 2339B(a)(1).

2. The discovery to be provided by the government in this case includes sensitive information, whose unrestricted dissemination could adversely affect national security, law enforcement interests and the privacy interests of third parties.

3. On December 4, 2018, the government filed an unopposed motion for a protective order regarding discovery (R. #38). The accompanying order allowed the defendant to review the sensitive discovery material to be held by MCC staff and reviewed by the defendant in the MCC law library. After further discussion with the MCC, due to the nature of the sensitive discovery material, this process is not tenable in this case. The government, therefore, proposes that the sensitive material be

maintained by defense counsel and reviewed by the defendant in the presence of his attorneys at the MCC.

4. The government has discussed the proposed amended protective order with counsel for defendants, who oppose the entry of the proposed order, specifically as it relates to the requirement that the defendant review such material in the presence of his attorneys.

WHEREFORE, the government respectfully moves this Court to enter the proposed amended protective order regarding general and sensitive discovery material.

Respectfully submitted,

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United States Attorney

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